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8 Attorneys for Defendant
UNICITY INTERNATIONAL, INC.

9 UNITED STATES DISTRICT COURT
10 DISTRICT OF NEVADA

11 ALEXANDER RODRIGUEZ, an individual,

12 Plaintiff,

13 v.

14 UNICITY INTERNATIONAL, INC., a Delaware
Corporation,

15 Defendant.
16

Case No. 2:25-cv-00754-APG-MDC

**STIPULATION TO EXTEND TIME FOR
DEFENDANT TO FILE RESPONSIVE
PLEADING TO PLAINTIFF'S
COMPLAINT**

[FIRST REQUEST]

17 Plaintiff ALEXANDER RODRIGUEZ ("Plaintiff") and Defendant UNICITY
18 INTERNATIONAL, INC. ("Defendant"), by and through their undersigned counsel, hereby agree and
19 stipulate to extend the time for Defendant to file a response to the Complaint from the current deadline
20 of June 10, 2025, up to and including **June 24, 2025**.

21 The parties agree that good cause exists for this extension as counsel for Defendant was only
22 recently retained. The additional time will allow defense counsel to conduct an investigation into the
23 allegations and to prepare a response to the Complaint.

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1 This is the first request for an extension of time to respond to the Complaint. This request is
2 made in good faith and not for the purpose of delay.

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4 Dated: June 3, 2025

Dated: June 3, 2025

5 Respectfully submitted,

Respectfully submitted,

6
7 /s/ Marian L. Massey

/s/ Taylor A. Buono

8 Jemma E. Dunn, Esq.
9 Matthew T. Hale, Esq.
10 Marian L. Massey, Esq.
11 GREENBERG GROSS LLP

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12 *Attorneys for Plaintiff*
13 ALEXANDER RODRIGUEZ

Attorney for Defendant
UNICITY INTERNATIONAL, INC.

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15 **IT IS SO ORDERED.**

16 Dated: 6/20/25

17
18 UNITED STATES MAGISTRATE JUDGE

